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8
9 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION
10 STATE OF CALIFORNIA
11

12 In the Matter of)	FPPC No.: 00/658
)	
13)	
14 DAVID DHILLON, DAVID DHILLON)	STIPULATION, DECISION and
CAMPAIGN, DHILLON FOR SUPERVISOR,)	ORDER
15 and DHILLON FOR ASSEMBLY,)	
)	
16 Respondents.)	
)	

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18 Complainant, Mark Krausse, Executive Director of the Fair Political Practices Commission, and
19 Respondents, David Dhillon, David Dhillon Campaign, Dhillon for Supervisor, and Dhillon for
20 Assembly, hereby agree that this stipulation will be submitted for consideration by the Fair Political
21 Practices Commission at its next regularly scheduled meeting.

22 The parties agree to enter into this stipulation to resolve all factual and legal issues raised in this
23 matter, and to reach a final disposition without the necessity of holding an administrative hearing to
24 determine the liability of Respondents.

25 Respondents understand, and hereby knowingly and voluntarily waive, any and all procedural
26 rights set forth in sections 83115.5, 11503, and 11523 of the Government Code, and in section 18361 of
27 title 2 of the California Code of Regulations. This includes, but is not limited to, the right to personally
28 appear at any administrative hearing held in this matter, to be represented by an attorney at

1 Respondents' own expense, to confront and cross-examine all witnesses testifying at the hearing, to
2 subpoena witnesses to testify at the hearing, to have an impartial administrative law judge preside over
3 the hearing as a hearing officer, and to have the matter judicially reviewed.

4 It is further stipulated and agreed that Respondents violated the Political Reform Act by failing
5 to file campaign statements, in violation of sections 84200 and 84200.5 of the Government Code (4
6 counts); by failing to file a statement of intention to be a candidate, in violation of section 85200 of the
7 Government Code (1 count); by failing to include required information on campaign statements, in
8 violation of section 84211 of the Government Code (4 counts); as described in Exhibit 1. Exhibit 1 is
9 attached hereto and incorporated by reference, as though fully set forth herein. Exhibit 1 is a true and
10 accurate summary of the facts in this matter.

11 Respondents agree to the issuance of the decision and order, which is attached hereto.
12 Respondents also agree to the Commission imposing upon them an administrative penalty in the amount
13 of Nineteen Thousand Dollars (\$19,000). A cashier's check from Respondents in said amount, made
14 payable to the "General Fund of the State of California," is submitted with this stipulation as full
15 payment of the administrative penalty, to be held by the State of California until the Commission issues
16 its decision and order regarding this matter. The parties agree that in the event the Commission refuses
17 to accept this stipulation, it shall become null and void, and within fifteen (15) business days after the
18 Commission meeting at which the stipulation is rejected, all payments tendered by Respondents in
19 connection with this stipulation shall be reimbursed to Respondents. Respondents further stipulate and
20 agree that in the event the Commission rejects the stipulation, and a full evidentiary hearing before the
21 Commission becomes necessary, neither any member of the Commission, nor the Executive Director,
22 shall be disqualified because of prior consideration of this stipulation.

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25 Dated: _____

Mark Krausse
Executive Director
Fair Political Practices Commission

1
2 Dated: _____

3 _____
4 David Dhillon, individually and on behalf of
5 David Dhillon Campaign, Dhillon for Supervisor,
6 and Dhillon for Assembly, Respondents.

7 **DECISION AND ORDER**

8 The foregoing stipulation of the parties “In the Matter of David Dhillon, David Dhillon
9 Campaign, Dhillon for Supervisor, and Dhillon for Assembly, FPPC No. 00/658,” including all attached
10 exhibits, is hereby accepted as the final decision and order of the Fair Political Practices Commission,
11 effective upon execution below by the Chairman.

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13 IT IS SO ORDERED.

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15 Dated: _____

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17 Liane M. Randolph, Chairman
18 Fair Political Practices Commission
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